It would also be appropriate to treat revenues from second lines purchased from the provider of the primary basic exchange line as discretionary service revenue associated with the basic exchange service furnished to that household. The addition of a second line is a discretionary telecommunications expenditure not unlike, for example, the purchase of call waiting, caller ID, or other vertical features. The ILECs admit that they are experiencing significant growth in second lines,[31] and that such growth in demand is being met without any significant new investments.[32] Thus, when making a determination regarding the need for high-cost support, it is appropriate to include the revenues from second lines as a discretionary revenue source, and to count them against any entitlement for high-cost support.

---

[31] See e.g., Four Baby Bells Report Healthy Results: Sales of Second Phone Lines Stay Strong, Allying Fears of Some Analysts, WALL ST. J. (Oct. 18, 1996); Raymond F. Smith, Keynote Address at the Wall Street Journal Conference: Business and Technology in the Next Millennium (Sept. 18, 1996); and BellSouth Reports Record Third Quarter, Press Release (Oct. 17, 1996).

[32] See e.g., Raymond F. Smith, Speech Delivered at Merrill Lynch Telecommunications CEO Conference (March 19, 1996). The effect of this phenomenon on revenue-per-line statistics also must be considered.

B. Two distinct revenue-based thresholds should be computed to recognize ILECs' unique access to revenues from yellow pages.

The Joint Board recommended that the revenue-per-line benchmark be consistent with the proxy model's computation of costs.[33] The Joint Board concluded that the cost proxy models do not include the cost of providing toll services (for example, tandem switches and other toll-related network costs are excluded). Accordingly, the Joint Board recommended that toll revenues should not be included in the computation of the benchmark.[34] As discussed elsewhere, there is a wide disparity among local calling areas throughout the nation, and this disparity has implications for the design of a competitively neutral revenue-based benchmark. The RD recommended that the revenues used to compute the benchmark encompass local revenues, discretionary revenues and access services.[35]

Conspicuously absent from the Joint Board's discussion of revenues, however, are the substantial revenues derived from

---

33 Recommended Decision at para. 311.

34 Id. at para. 311.

35 Id. at para. 310. TW Comm assumes that the Joint Board's proposed inclusion of "access" would encompass all intrastate and interstate subscriber line charges, carrier common line charges, switched access and residual interconnection charges, but urges the FCC to clarify the proposed role of these critical rate elements for such time as they continue to exist at either the interstate or intrastate level.

ILECs' yellow page operations. Revenues from yellow pages have been linked to basic residential telephone service for decades. The Modified Final Judgment, for example, assigned the yellow pages business to the BOCs at the time of divestiture. Moreover, nothing in the 1996 Act alters this fundamental link. Competition in the provision of basic exchange service does not diminish the fundamentally monopolistic nature of the yellow pages business.

Further, unlike access and discretionary revenues, yellow pages revenues will not flow to the new entrant when a customer switches providers. On the one hand, to include yellow page revenues in a revenue-based threshold would unfairly disadvantage new entrants. This is because under such a scenario, the level of high-cost support available to new entrants would be based on an expectation of being able to generate revenues that, in fact, are attainable only by the incumbents. On the other hand, to exclude this substantial source of revenue would give ILECs a huge and unwarranted windfall. This is because the ILECs' share of the universal service support[36] would be computed without consideration of this revenue stream.

---

[36] As previously discussed, ILECs will be the major recipients of high-cost support for the foreseeable future.

The Commission could resolve this inherent dilemma by establishing two separate revenue-per-line thresholds, one for ILECs and another for new entrants. The FCC should include yellow pages revenues when computing the ILECs' threshold, and should exclude yellow pages revenue when computing the threshold to be applied to new entrants.[37]

C. **The relative merits of a national versus a state benchmark is linked to the issue of the way in which the burden of high-cost support is to be spread.**

All else being equal, the use of a national benchmark and the corresponding recovery of the high-cost subsidy at the interstate level, will result in an income transfer from the low-cost and/or high-revenue states to the high-cost and/or low-revenue states, not unlike that which occurs today (albeit to a substantially lesser degree) under the existing high-cost program.[38]

The FCC's decision as to whether to use a state benchmark or national benchmark should be linked to the decision of which jurisdiction will be responsible for the high-cost

[37] TW Comm assumes that the computation of revenues-per-line will be based upon all local exchange carriers' revenues. However, for the foreseeable future, the vast majority of the revenues will represent those of ILECs.

[38] Revenues are not taken into account today. A portion of the unseparated high-cost is subsidized through interstate rates today.

support, because there will be structural differences among states as to the elements of their respective average per-line revenues. A major (but certainly not the only) source of such differences stems from variations in the size of local calling areas. Colorado, for example, has geographically extensive local calling areas, while in Wyoming most calls between even adjacent exchanges are subject to toll charges. Merely excluding intraLATA toll revenues from the "average revenue" calculation does not cause the figures for these two states to become comparable. Calls that are "local" in Colorado (and hence are included in the "average revenue" calculation) would be "toll" in Wyoming and would be excluded from that same calculation. If the federal jurisdiction is expected to provide the subsidy, funds will tend to flow toward Wyoming and away from Colorado not necessarily because of any fundamental cost differences between these two states, but simply because of differences in local rate structures.

The cost of "basic" local exchange service in Colorado is higher than in Wyoming because it includes a greater amount of interoffice plant and switching costs (to serve the large local calling areas), but the cost that will be used for the purpose of computing high-cost support will likely be a proxy model that reflects a national average amount of usage. Thus, Colorado's cost may be higher than that computed by the proxy model for that state.

Turning to the revenue side, the revenue for basic local exchange service is likely to be higher in Colorado than the national average because the rate for basic local exchange service is likely to be higher to reflect the relatively larger calling areas. Thus, Colorado's revenues (for basic local exchange) may be greater than the national average, offsetting to some extent the greater actual costs than those estimated by a cost proxy model. There is no assurance, however, that state-specific variations in costs and revenues vis-a-vis the national averages will track. States with a large toll revenue component may be relying upon toll contributions to support low basic rates, whereas states (with equivalent local calling areas) that have implemented rate rebalancing will tend to have higher local rates. There are simply too many unaccounted for variations from national average costs and revenues to permit the use of such broadly averaged values.

The FCC should seek to avoid creating incentives for uneconomic or unfair rate setting behavior on the state level. If state benchmarks were set individually based upon state revenues, but high costs were to be recovered at the interstate level, states would have an incentive to keep basic local exchange service rates low so as to be eligible for a relatively larger amount of high-cost support. If, on the other hand, the responsibility for high-cost recovery resided solely with the states, it would be appropriate to establish state benchmarks.

This ties back to TW Comm's earlier recommendation that all revenues that are inextricably linked with basic telephone service should be included in the computation of a revenue-based benchmark, including switched access revenues, whether directly billed or as an imputed component of all toll (whether that toll calling is separately rated as basic MTS or included within an optional toll calling plan).[39] As previously stated, including imputed switched access revenue for all toll demand is not only required for competitive neutrality, but it also addresses the (1) very significant disparities in the local calling areas from state to state[40] and (2) wide range of progress in rate rebalancing among the various state jurisdictions.

---

[39] As earlier noted, until such time as intraLATA presubscription has been fully implemented, the entire toll revenue should be included.

[40] Furthermore, there are numerous "optional" calling packages that could be construed as either local calling plans, toll plans, or a combination of both.

D. **The Commission should evaluate the relative merits of freezing the revenue benchmark versus periodically adjusting the benchmark, with an overarching goal of preventing the establishment of a "make-whole" mechanism.**

In its discussion of the use of a revenue-per-line benchmark, the RD recognizes that the future use of such a benchmark might become inappropriate because carriers may package local and long-distance services. The RD recommends that it "might be necessary to reevaluate the use of a benchmark based on average nationwide revenues per line for local, discretionary, and access services."[41] The RD also recommends that the "Commission review the benchmark on a periodic basis, and consider the need to make appropriate adjustments."[42]

The Commission should consider and seek further comment on the merits of freezing the revenue-per-line benchmark. Reasons for freezing a revenue-per-line threshold would be, among other things, (1) to comport with the important principle of competitive neutrality and (2) to prevent the back-door establishment of a make-whole mechanism. Ideally, a public policy-based subsidy should not protect carriers from the outcome of competition -- including the possibility that any given carrier

---

[41] Recommended Decision at para. 163.

[42] Id. at para. 310.

may generate less revenue tomorrow than it does today. By contrast, the potential drawback of freezing the revenue-per-line benchmark is that such a measure could inadvertently yield a windfall to carriers. Demand for discretionary services (including second lines) is increasing, generating new revenues that greatly exceed the associated service costs. TW Comm recommends that these competing concerns be addressed by applying an objective price level index, such as the Consumer Price Index ("CPI"), to the national revenue benchmark level, but also (as discussed further below) taking into account the actual revenues received by the ILEC in determining the level of high-cost support to made available in the relevant geographic area.

E. Notwithstanding the results from applying a national revenue benchmark, universal service subsidies should not be permitted to flow to carriers serving areas where the customers are generating above-cost revenues or have the means to afford rates that cover their cost of service.

Determining costs on a wire center or census block group ("CBG") basis while looking at revenues based on a national average creates the possibility that a carrier deriving revenues significantly above the national average from a particular geographic area could nevertheless be entitled to draw universal service support funds for that area. Similarly, providing support based on the difference between proxy cost and national average revenue does not account for the fact that many high-cost areas are populated by customers who can afford to pay a cost-based rate for telephone service. Thus, while geographic areas that have proxy costs below the national revenue benchmark should be automatically and conclusively eliminated from USF funding eligibility, two additional criteria should be examined before a USF entitlement is determined to exist. These are: (1) actual revenues being received in the relevant area and (2) the average income in the wire center or CBG (i.e., the geographic unit on which support is determined).

Suppose, for example, that the national average revenue is $30, and that a particular area has a proxy cost of $35. Using a national revenue benchmark alone, those facts would entitle the carrier to draw $5 per-line per month from the USF, irrespective of the actual revenues that the carrier derives <u>from that area</u>. If, in this same instance, the carrier's actual revenues are $45, the result will be that an area that is already producing $10 of revenues in excess of costs will nonetheless be allowed to draw $5 in subsidy funds. Such an outcome is inconsistent with the narrow targeting of universal service funding intended under the Act. Thus, in the event that a geographic area used to determine universal service support has proxy costs that exceed the national revenue benchmark but are below the actual revenue being received, there should be no entitlement to funding. If the actual revenue is less than proxy cost but greater than the national benchmark, it would be appropriate to fund only the smaller difference.[43]

The adjustment just described addresses the carrier's ability to cover costs with actual revenues; however, it does not specifically address the affordability of higher rates to customers in the geographic area. A geographic area that might otherwise be eligible for support based on a comparison of benchmark costs and benchmark and/or actual revenues should still be evaluated using an income-based benchmark to ensure that subsidies do not flow to carriers serving geographic areas in which customers could easily afford to pay rates that would cover the costs of providing service.

This can be accomplished by incorporating into the eligibility equation the average household income for each geographic area as provided by the Census Bureau. CBGs, in particular, are designed to be homogeneous with respect to the major demographic characteristics of its residents. High income areas often display high-cost attributes due to relatively large lot sizes, distances from the population center of the exchange

---

[43] Stated differently, the fundable amount would be the difference between the proxy cost and the national benchmark or the actual revenues, whichever is less.

where the central office is most likely to be located, and terrain. Indeed, preliminary research undertaken by TW Comm suggests that high income areas are actually more likely to exhibit high costs than all areas without regard to incomes. For example, within Fairfield County, Connecticut, in census tracts with average incomes over $100,000, 23 (of 31) CBGs with average incomes of over $100,000 have costs in excess of $30 per month.[44] Under the Joint Board's recommendations, these CBGs would qualify for high-cost support if the national revenue benchmark were established at the $30 per month level. To prevent this from occurring, there must be an additional level of screening, based on income, before any universal service support funds are distributed to a given geographic area. The income "cut-off" for high-cost support could be stated in a relatively simple manner (x% above the national median income, for example) and could rely on existing, publicly available data. The objective would be to preclude subsidies from flowing to any geographic area in which the affordability of telephone service simply should not be an issue.[45]

---

[44] The BCM 2 proxy (high overhead) cost for one Litchfield County CBG is $146.62.

[45] At a minimum, the decision to subsidize high income areas should be made by as well as funded by the states. Support for such areas should not be part of the federal fund.

Requiring ILECs and competitive LECs to disclose actual revenues could raise some competitive concerns. The fact that such information would be provided exclusively to an independent and neutral USF administrator, with strict conditions of confidentiality, should go a long way toward allaying these concerns. Additionally, looking at actual revenues could be made the last step in the process of qualifying for universal service support in a particular area. In other words, one would compare the proxy cost and national revenue benchmark, based on the criteria discussed above. In this way, the number of wire centers/CBGs for which actual revenues would need to be disclosed would be minimized.

IV. Schools and Libraries

A. The Joint Board's Recommended Decision failed to account for state programs

The Joint Board recommended that the Commission establish a special discount for all eligible schools and libraries located in rural, insular, high-cost and economically disadvantaged areas.[46] Its decision, however, did not take into account the fact that many states have already instituted regulatory initiatives that provide schools and libraries with the opportunity to receive telecommunications services at

[46] Recommended Decision at para. 440.

discounted rates. Some of these programs may structure rates in such a manner that the state is internally generating a subsidy to fund these programs. Further, due to the structure of state averaging models, two schools could pay the same price for the same service, although only one is located in a high-cost area. It is imperative that the Commission take current state programs into account before establishing a discount because some schools and libraries may already be receiving a subsidy for the same service through state programs and because state averaging models could be allocating high costs throughout the state.

B. The Commission must distinguish between wealthy schools and low-income schools when calculating the level of the discount.

The Joint Board suggested that the Commission use a program, such as the national school lunch program, as a method to measure the relative economic disadvantage of schools and libraries.[47] As the Joint Board recognized, subsidizing wealthy schools fails to advance universal service goals because wealthy schools already possess the resources to purchase telecommunications services without the subsidy. Although adoption of the national school lunch program standard for differentiating among wealthy and disadvantaged schools will help, the Commission should continue to evaluate and refine other

---

[47] Id. at paras. 562-70.

approaches to minimize the drain on the limited resources available to support universal service.

C. Only schools and libraries falling within the statutory definition should receive universal service funding.

The 1996 Act provides that schools eligible to receive services funding under universal service support mechanisms must meet the statutory definition provided in the Elementary and Secondary Education Act of 1965.[48] Specifically, Section 254(h)(4) provides that in order to be eligible, a school must not operate as a for-profit business, and must not have an endowment exceeding $50,000,000.[49] In order to receive universal services funds, libraries must be "eligible for participation in state-based plans for funds under title III of the Library Services and Construction Act and must not operate as a for-profit business."[50]

The possibilities for abuse in administering this policy are substantial. The Commission must ensure that entities receiving universal service support fall within the scope of the statutory definitions of schools and libraries. The RD encouraged schools and libraries to aggregate their demands with

---

[48] 1996 Act at § 254(h)(5).

[49] Id. at § 254(h)(4).

[50] Id.

others to create a consortium in order to attract competitive pricing. However, it recognized the difficulties that such consortia create for the Commission.[51] If the Commission decides to permit eligible and ineligible entities to participate in the same consortium, it must ensure that ineligible entities do not receive unwarranted subsidies. The Commission must ensure that any such consortium allocates costs equitably and distributes subsidy benefits only to those consortium members that are eligible to receive universal service support under the 1996 Act.

D. **The Commission must ensure that universal service funds are used only for educational purposes.**

Section 254(h)(1)(B) of the 1996 Act provides that all telecommunications carriers must provide services, upon a bona fide request, to schools and libraries for educational purposes.[52] Although not specifically addressed by the Joint Board's RD, the Commission must restrict the allocation of universal service funds strictly for educational purposes. As with consortia composed of eligible and ineligible entities, the potential for abuse should not be underestimated. Accordingly, the Commission should seek comment on the scope of the term "for educational purposes." For example, industrial research projects

---

[51] Recommended Decision at paras. 537, 593-594.

[52] 1996 Act at § 254(h)(1)(B)(emphasis added).

should not be classified as an educational purpose. In order to avoid potential abuse, the Commission should establish guidelines to clarify which activities will be considered "educational" for purposes of receiving universal service benefits.

E. The Commission must set a reasonable "cap" for universal services provided to schools and libraries.

The Joint Board recommended that the Commission set an annual cap on spending universal service funds designated for schools and libraries at $2.25 billion per year.[53] However, in light of the fact that the RD leaves unresolved substantial areas in which there are expected needs for universal service funding, the Commission should consider adopting steps to ensure that the $2.25 billion cap is not exceeded or revised in the future. Put simply, because resources for universal service are not unlimited, establishment of a cap for a particular market segment without considering the entire spectrum of universal service needs runs the risk that it will be set too high. Moreover, it is impossible to predict the cost of the subsidies at issue without first adopting a working funding mechanism. Until this has been accomplished, the Commission cannot reasonably establish an annual cap that will cover all the discounted services for schools and libraries recommended by the Joint Board.

---

[53] Recommended Decision at para. 556.

In addition, the Commission must provide the industry with specific details on both the implementation and the monitoring of the annual cap. For example, the Commission should supervise the allocation of the funds consistently in order to ration the remaining funds to ensure they are allocated equitably to the schools and libraries with the greatest need.

V. Conclusion

The RD clearly reflects the strenuous efforts of the Joint Board to resolve the many difficult issues presented by universal service reform and TW Comm commends the Joint Board's efforts to establish and foster a more efficient and effective USF. However, consistent with the principles of reasoned decision making and its enabling statute, the Commission may substitute its own policy judgments for those of the Joint Board. Thus, the Commission must take the necessary steps to create the consistent policies necessary to achieve the goals of Section 254 as well as to reconcile apparent contradictions within the RD.

Respectfully submitted,

TIME WARNER COMMUNICATIONS HOLDINGS, INC.

By: David R. Poe \CPM

David R. Poe
Catherine P. McCarthy
Yvonne M. Coviello

Its Attorneys

LeBoeuf, Lamb, Greene & MacRae, LLP
1875 Connecticut Avenue, NW
Suite 1200
Washington, DC 20009

Economic Consultants:
Lee L. Selwyn
Susan M. Baldwin
Helen E. Golding
Economics and Technology, Inc.
One Washington Mall
Boston, MA 02108

Paul B. Jones
Donald F. Shepheard
Time Warner Communications Holdings, Inc.
300 First Stamford Place
Stamford, CT 06902-6732

Dated: December 19, 1996

<u>CERTIFICATE OF SERVICE</u>

I, Catherine P. McCarthy, hereby certify that on this 19th day of December, 1996, a true copy of the foregoing Comments filed by Time Warner Communications Holdings, Inc., were sent via First Class Mail, Postage Prepaid, or Hand Delivered, upon each of the parties on the attached Service List.

Catherine P. McCarthy

Catherine P. McCarthy

SERVICE LIST

Office of the Secretary*
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

The Honorable Reed E. Hundt, Chairman*
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, DC 20554

The Honorable Rachelle B. Chong,*
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554

The Honorable Susan Ness, Commissioner*
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, DC 20554

Honorable Julia Johnson, Commissioner
Florida Public Service Commission
2540 Shumard Oak Blvd.
Gerald Gunter Building
Tallahassee, FL 32399-0850

The Honorable Kenneth McClure,
Commissioner
Missouri Public Service Commission
301 W. High Street, Suite 530
Jefferson City, MO 65101

The Honorable Sharon L. Nelson, Chairman
Washington Utilities and Transportation
Commission
P.O. Box 47250
Olympia, WA 98504-7250

The Honorable Laska Schoenfelder,
Commissioner
South Dakota Public Utilities Commission
State Capitol, 500 E. Capitol Street
Pierre, SD 57501-5070

Martha S. Hogerty
Public Counsel for the State of Missouri
P.O. Box 7800
Jefferson City, MO 65102

Anna Gomez
Federal Staff Chair
Federal Communications Commission
2100 M Street, N.W., Room 8617
Washington, D.C. 20036

Paul E. Pederson
State Staff Chair
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Lisa Boehley
Federal Communications Commission
2100 M Street, N.W. Room 8605
Washington, D.C. 20554

Charles Bolle
South Dakota Public Utilities Commission
State Capitol, 500 E. Capitol Street
Pierre, SD 57501-5070

Deonne Bruning
Nebraska Public Service Commission
300 The Atrium
1200 N Street, P.O. Box 94927
Lincoln, NE 68509-4927

James Casserly
Senior Legal Advisor
Office of Commissioner Susan Ness
Federal Communications Commission
1919 M Street, Room 832
Washington, D.C. 20554

John Clark
Federal Communications Commission
2100 M Street, N.W., Room 8619
Washington, DC 20554

Bryan Clopton
Federal Communications Commission
2100 M Street, N.W., Room 8615
Washington, D.C. 20554

Irene Flannery Federal Communications Commission
2100 M Street, N.W., Room 8922
Washington, D.C. 20554

Daniel Gonzalez*
Legal Advisor
Office of Commissioner Rachelle B. Chong
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554

Emily Hoffnar
Federal Communications Commission
2100 M Street, N.W., Room 8623
Washington, D.C. 20554

L. Charles Keller
Federal Communications Commission
2100 M Street, N.W., Room 8918
Washington, D.C. 20554

Lori Kenyon
Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501

David Drech
Federal Communications Commission
2025 M Street, N.W., Room 7130
Washington, D.C. 20554

Debra M. Kriete
Pennsylvania Public Utilities Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Diana Law
Federal Communications Commission
2100 M Street, N.W., Room 8920
Washington, D.C. 20554

Mark Long
Florida Public Service Commission
2540 Shumard Oak Blvd.
Geral Gunter Building
Tallahassee, FL 32399

Robert Loube
Federal Communications Commission
2100 M Street, N.W., Room 8914
Washington, D.C. 20554

Samuel Loudenslager
Arkansas Public Service Commission
P.O. Box 400
Little Rock, AR 72203-0400

Sandra Makeeff
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Philip F. McClelland
Pennsylvania Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, Pennsylvania 17120

Michael A. McRae
D.C. Office of the People's Counsel
1133 15th Street, N.W. -- Suite 500
Washington, D.C. 2005

Tejal Mehta
Federal Communications Commission
2100 M Street, N.W., Room 8625
Washington, D.C. 20554

Terry Monroe
New York Public Service Commission
3 Empire Plaza
Albany, NY 12223

John Morabito
Deputy Chief, Accounting and Audits Division
Common Carrier Bureau
Federal Communications Commission
2000 L Street, N.W., Suite 812
Washington, D.C. 20554

Mark Nadel
Federal Communications Commission
2100 M Street, N.W., Room 8916
Washington, D.C. 20554

John Nakahata
Senior Legal Advisor
Office of Chairman Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Lee Palagyi
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
Olympia, WA 98504

Kimberly Parker
Federal Communications Commission
2100 M Street, N.W., Room 8609
Washington, D.C. 20554

Barry Payne
Indiana Office of the Consumer Counsel
100 North Senate Avenue, Room N501
Indianapolis, IN 46204-2208

Jeanine Poltronieri
Federal Communications Commission
2100 M Street, N.W., Room 8924
Washington, D.C. 20554

Michael Pryor
Federal Communications Commission
2100 M Street, N.W., Room 8905
Washington, D.C. 20554

James Bradford Ramsay
National Association of Regulatory Utility Commissioners
P.O. Box 684
Washington, D.C. 20044-0684

Brian Roberts
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Gary Seigel
Federal Communications Commission
2000 L Street, N.W., Suite 812
Washington, D.C. 20554

Richard D. Smith
Federal Communications Commission
2100 M Street, N.W., Room 8605
Washington, D.C. 20554

Pamela Szymczak
Federal Communications Commission
2100 M Street, N.W., Room 8912
Washington, D.C. 20554

Lori Wright
Federal Communications Commission
2100 M Street, N.W., Room 8603
Washington, D.C. 20054

Sheryl Todd**
Common Carrier Bureau
2100 M Street, NW
Room 8611
Washington, DC 20554

International Transcription Service*
2100 M Street, N.W.
Room 140
Washington, DC 20037

Telecommunications Reports
1333 H Street, NW
Suite 100 - East
Washington, DC 20005

* Hand Delivery
** Hand-Delivery with diskette